



1 approximately April 2009, all in violation of 18 U.S.C. § 1084 and other federal anti-gambling  
2 statutes. A principal situs of that illegal operation was Las Vegas, Nevada.

3 Pursuant to plea negotiations between Mr. Gariti and the Government, on September 24,  
4 2009, Mr. Gariti entered a change of plea before this Court.

5 In the meantime, the Government has a deadline, under the strictures of 18 U.S.C. § 983  
6 (a)(3)(A), to file its forfeiture complaint, regarding the above-captioned currency, no later than April  
7 27, 2011.

8 The criminal case will not be disposed of by the time the Government is required to file its  
9 complaint. However, counsel for the United States believes that there will be a final disposition of  
10 this matter before the expiration of the time period for the continuance requested herein; making  
11 further requests for continuances unnecessary.

12 On December 27, 2010, defendant's counsel, Margaret Stanish, agreed to the extension of  
13 time and authorized counsel for the United States to file an Unopposed Motion with this Court.

14 Finally, on April 15, 2011, defendant's counsel, Margaret Stanish, agreed to the seventh  
15 extension of time and authorized counsel for the United States to file this Unopposed Motion with this  
16 Court. Because the parties have agreed to the extension of time to file a Civil Complaint For  
17 Forfeiture In Rem and to facilitate a final universal plea/sentencing disposition, this Court should  
18 extend the time.

19 This motion is not submitted solely for the purpose of delay or for any other improper  
20 purpose.

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1 WHEREFORE, the United States moves this Court to grant its motion to extend the time for  
2 the United States to file its civil complaint in the above-captioned matter for an additional 120 days,  
3 or until August 25, 2011.

4 DATED this 20<sup>th</sup> day of April, 2011.

5 Respectfully submitted,

6 DANIEL G. BOGDEN  
7 United States Attorney

8 /s/Michael A. Humphreys  
9 MICHAEL A. HUMPHREYS  
10 Assistant United States Attorney

11 IT IS SO ORDERED:

12 DATED this 2nd day of May, 2011.

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17 LARRY R. HICKS  
18 UNITED STATES DISTRICT JUDGE  
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